

VZCZCXYZ0000  
RR RUEHWEB

DE RUEHC #0211 3242136  
ZNR UUUUU ZZH  
R 202131Z NOV 09  
FM SECSTATE WASHDC  
TO RUEHRO/AMEMBASSY ROME 0000  
INFO RUEKJCS/SECDEF WASHINGTON DC  
RUCPDO/USDOC WASHINGTON DC 0000  
RHMCSUU/FBI WASHINGTON DC 0000  
RUETIAA/DIRNSA FT GEORGE G MEADE MD  
RUEAIIA/CIA WASHINGTON DC

UNCLAS STATE 120211

SIPDIS  
ROME FOR CHRIS CURRAN

E.O. 12958: N/A  
TAGS: [ETTC](#) [KOMC](#) [IT](#)  
SUBJECT: BLUE LANTERN LEVEL 3: POST-SHIPMENT END-USE CHECK  
ON LICENSES 050190394, 050190382, AND 050190375

REF: 2006 BLUE LANTERN GUIDEBOOK

11. This is an Action Request. See paragraphs 2-4.

12. The Department's Office of Defense Trade Controls Compliance (PM/DTCC) requests Post's assistance in conducting a post-shipment check on licenses 050190394, 050190382, and 050190375 for the export of International Traffic in Arms (ITAR)-controlled aircraft spare parts to Italy. Post is requested to complete this Blue Lantern inquiry within 45 days. Lack of response to a Blue Lantern inquiry will affect pending and future licenses involving parties to this license.

13. Reason for request: Applicant submitted multiple Letters of Intent (LOI) from three different foreign consignees (FC), each with the same wording inserted onto the respective foreign consignee letterheads. The LOIs are "blanket" requests (\$1 million licenses requesting various spare parts for multiple different aircraft). The license applications state that BAS is responsible for obtaining, receiving, inspecting, and distributing the parts to the foreign consignees, an arrangement that suggests stockpiling of parts by BAS (stockpiling is forbidden under the ITAR without a specific agreement to do so). No firm purchase orders were submitted.

Additionally, all licenses list ultimate end-user as Italy MOD/Air Force; LOI submitted by FC Piaggio, however, states end-users in Malaysia and the UAE, in addition to Italy. PM/DDTC would like to verify that all USML will only be provided to the licensed ultimate end-user, Italy Ministry of Defense.

14. ACTION: The Department requests that Post make inquiries with FIC BAS to determine disposition of United States Munitions List (USML) items exported under these licenses. Inquiries should also be made with FC Piaggio to ascertain whether any other end-users other than Italy MOD will be receiving these items. PM/DTCC requests that Post conduct a site visit to BAS in order to provide Department with an assessment of its business operations and on-site security. Post is also asked to assess whether the company appears to be a reliable recipient of United States Munitions List (USML) items. If a site visit is not possible, please inform the PM/DTCC officer.

The following questions are provided as suggested guidance with BAS:

--Does the company have existing contracts or purchase orders with Piaggio, Secondo Mona, and Aermeccanica for the items listed in the subject licenses?

--Have the articles exported thus far been transferred to the

FCs or do they remain in your possession? Have any been transferred to the ultimate end-user, Italian MOD?

--Does the company have secure facilities and proper accounting and security procedures for handling sensitive USML items?

--Does the company understand the restrictions on USML items, especially the prohibition against unauthorized re-transfers and re-exports?

--Does the company understand the restrictions on the unauthorized stockpiling of USML items?

Question for FC Piaggio:

-- Besides the Italian MOD, have any other end-users or will any other end-users receive these U.S. aircraft spare parts? If so, which ones? (Note: Original LOI submitted by Piaggio suggested end-use in Malaysia and UAE as well as Italy, though license application stated only Italy MOD as end-user. Piaggio later submitted a revised LOI that removed Malaysia and UAE.)

END ACTION.

#### 15. Details of license applications:

\*\*\*\*\*  
DTC CASE: 050190394  
\*\*\*\*\*

#### QUANTITY/COMMODITY:

1 Lot - Spare parts and components for the following aircraft: Engine T53 on helicopter AB205, Engine T55 on helicopter CH47, Engine Viper on Macchi A/P MB993, Piaggio A/P P180 and Piaggio A/P P166.

License Value: 1,000,000.00 USD

#### SELLER:

Bonetti Aircraft of America  
8480 Tyco Road Unit F  
Vienna, VA 22182  
Tel: 703-378-6450  
POC: Carlos Hillman

#### FOREIGN INTERMEDIATE CONSIGNEE:

Bonetti Aircraft Support Spa  
World Trade Center  
Via de Marini 1  
Genova  
Italy

#### FOREIGN CONSIGNEE:

Piaggio Aero Industries Spa  
Headquarter Sede Legale, Viale Castro  
Pretorio, 116  
Rome 00185  
Italy  
Tel: 39-010-6488-412  
POC: Maurizio Roba  
Email: MRoba@piaggioaero.it

#### FOREIGN END-USER:

Italian Ministry of Defense - Italian Air Force  
Headquarter Via Della Universita, 4  
Rome  
Italy

#### PURPOSE:

Repair and maintenance of aircraft.

SHIPMENTS TO DATE:

21 Oct. 2009 - 2 Units - Fuel Control Assembly - 215,556.00  
USD

\*\*\*\*\*  
DTC CASE: 050190382  
\*\*\*\*\*

QUANTITY/COMMODITY:

1 Lot - Spare parts and components for the following  
aircraft: C-130, H/J, AMX, C-27J, JCA, G222, F35, EF2000,  
Tornado, SF260, M311, M339, M346, Hawk, CH47, EH101, NH90,  
SH3D, HH3F, A109, A129, A149, AB205, AB206, AB121, A412,  
P180, AV-8B Plus.

License Value: 1,000,000.00 USD

SELLER:

Bonetti Aircraft of America  
8480 Tyco Road Unit F  
Vienna, VA 22182  
Tel: 703-378-6450  
POC: Carlos Hillman

FOREIGN INTERMEDIATE CONSIGNEE:

Bonetti Aircraft Support Spa  
World Trade Center  
Via de Marini 1  
Genova  
Italy

FOREIGN CONSIGNEE:

Secondo Mona Spa  
Via C del Prete 1  
Somma Lombardo Varese 21019  
Italy  
Tel: 39-0331-756-111  
POC: Mr. Sergi Bogni

FOREIGN END-USER:

Italian Ministry of Defense - Italian Air Force  
Headquarter Via Della Universita, 4  
Rome  
Italy

PURPOSE:

Repair and maintenance of aircraft.

SHIPMENTS TO DATE:

9 Nov. 2009 - 1 Box - Aircraft Parts - 694.00 USD

\*\*\*\*\*  
DTC CASE: 050190375  
\*\*\*\*\*

QUANTITY/COMMODITY:

1 Lot - Spare parts and components for the following aircraft  
and engines: C-130, CH47, SH3D. AMX, HH3F, AB212, AB412, SPEY

License Value: 1,000,000.00 USD

SELLER:

Bonetti Aircraft of America  
8480 Tyco Road Unit F  
Vienna, VA 22182  
Tel: 703-378-6450  
POC: Carlos Hillman

FOREIGN INTERMEDIATE CONSIGNEE:

Bonetti Aircraft Support Spa  
World Trade Center  
Via de Marini 1  
Genova  
Italy

FOREIGN CONSIGNEE:

Aermeccanica S.R.L.  
Via Montegrappa 2  
21015 Lonate Pozzolo  
Varese  
Tel: 39-0331-301-750  
Italy

FOREIGN END-USER:

Augusta Westland  
Via G Augusta 520  
Samarate, Varese 21017  
Italy

Italy Ministry of Defense - Italian Air Force  
Headquarter Via Della Universita, 4  
Rome  
Italy

PURPOSE:

Repair and maintenance of aircraft.

SHIPMENTS TO DATE:

29 Sept. 2009 - 200 Units - Tube SWG - 3,200.00 USD  
13 Nov. 2008 - 240 Units - Tube SWG - 3,840.00 USD

¶6. Submitted in support of the license applications were the following documents (PM/DTCC will fax documentation to Post upon request):

--LOI signed by Material Manager of Piaggio, dated 1 August 2008.

--LOI signed by Managing Director of Secondo Mona, dated 28 May 2009.

--LOI signed by General Manager of Aermeccanica, dated 2 September 2009

--Department of State Licenses for Permanent Export of Unclassified Defense Articles and Related Unclassified Technical Data. Cases 050190375 and 050190382 approved 24 September 2009. Case 050190394 approved 7 October 2009.

¶7. Please slug reply for PM/DTCC - BLUE LANTERN COORDINATOR and include the words "Blue Lantern" and the case number in the subject line. POC is Meredith Sundlof. Phone: 202-663-3455; Email: SundlofME@state.gov; SIPRNET: SundlofME@state.sgov.gov. The Blue Lantern Guidebook (ref) is available as a PDF file at [http://www.intelink.sgov.gov/wiki/Blue Lantern End-Use Monitoring Program](http://www.intelink.sgov.gov/wiki/Blue_Lantern_End-Use_Monitoring_Program).

¶8. Department is grateful for Post's assistance in this matter.  
CLINTON